

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GRIFFEN SECURITY, LLC,

Plaintiff,

v.

BOBBIE THOMPSON, MARKEITH BOYD,
SHIRLEY LORRAINE BOYD, *and*
CITADEL CAR ALARMS, LLC.

Defendants.

Case No. 1:19-cv-03494

**NOTICE OF MOTION
AND MOTION FOR
PRELIMINARY
INJUNCTION**

PLEASE TAKE NOTICE that, upon the Declaration of Gavin Wilding, sworn to April 18, 2019, in support of Plaintiff's Motion for Preliminary Injunction, the exhibits attached thereto, the accompanying memorandum of law in support of plaintiff's motion, as well as the Complaint, the testimonies, transcripts, and evidence of record in this action, and such other and further evidence as may be presented to the Court at the time of the hearing, plaintiff Griffen Security, LLC will move this court, before United States District Judge _____, in Courtroom ____, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, in the City, County and State of New York, on a date and time to be designated by the Court for an Order:

1. Pursuant to Federal Rule of Civil Procedure 65, for a preliminary injunction preserving the *status quo* and prohibiting the defendants from taking any action in violation of the obligations set forth in the Patent License Agreement entered into between the Plaintiff and the individual defendants ("License Agreement"), effective May 25, 2018, including its unilateral

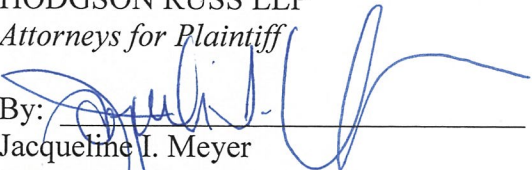
termination, at a minimum until the current litigation is completed. The License Agreement designates this Court as the appropriate forum to govern disputes thereunder.

2. Waiving any bond requirement as maintaining the valid License Agreement pursuant to its terms would have no financial impact on the Defendants.

3. Awarding plaintiff such other and further relief as this court may deem just and equitable.

Dated: New York, New York
April 19, 2019

HODGSON RUSS LLP
Attorneys for Plaintiff

By: 
Jacqueline I. Meyer
jmeyer@hodgsonruss.com
Hodgson Russ LLP
605 Third Ave, Suite 2300
New York, NY 10158
(646) 218-7633 (tel.)
(646) 943-7083 (fax)

Shauna Wertheim (*pro hac vice* pending)
swertheim@marburylaw.com
Robert M. Hansen (*pro hac vice* pending)
rhansen@marburylaw.com
The Marbury Law Group, PLLC
11800 Sunrise Valley Drive, 15th Floor
Reston, VA 20191
(703) 391-2900 (tel.)
(703) 391-7100 (fax)
Attorneys for Plaintiff Griffen Security, LLC